

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:18CV00085
Plaintiff,	:	
	:	
v.	:	
	:	
\$10,221.81 IN U.S. CURRENCY SEIZED	:	
FROM BANK OF AMERICA ACCOUNT	:	
ENDING IN 0050, IN THE NAME OF	:	
DANIEL ANASILI PAPKA,	:	
Defendant.	:	

VERIFIED COMPLAINT OF FORFEITURE

NOW COMES Plaintiff, the United States of America, by and through Matthew G.T. Martin, United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) for the forfeiture of the aforesaid defendant property which constitutes or was derived from proceeds traceable to an offense constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), or a conspiracy to commit such offense, specifically wire fraud (18 U.S.C. § 1343).

2. The defendant property is \$10,221.81 in U.S. Currency, which was seized on September 6, 2017, in Greensboro, North Carolina, while located within the jurisdiction of this Court, and has been deposited to the United States Marshals Service Seized Asset Deposit Fund.

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395, because the defendant property was seized while located in the jurisdiction of this Court, or one or more of the acts giving rise to forfeiture occurred in this district.

5. Upon the filing of this complaint, Plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which Plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that process of a Warrant for Arrest and Notice *In Rem* be issued for the arrest of the defendant property; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

This the 7th day of February, 2018.

Respectfully submitted,

MATTHEW G.T. MARTIN
United States Attorney

/s/ Steven N. Baker

Steven N. Baker

Assistant United States Attorney

NCSB #36607

101 S. Edgeworth Street, 4th Floor

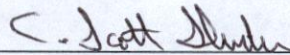
Greensboro, NC 27401

Phone: (336)333-5351

Email: steve.baker3@usdoj.gov

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Complaint are true and correct to the best of my knowledge, information and belief.



C. Scott Sluder
Task Force Officer
Department of the Treasury –
Office of Inspector General

DECLARATION

I, Christopher Scott Sluder, Task Force Officer (TFO) with the United States Treasury Office of Inspector General (TOIG) state under the penalty of perjury, pursuant to Title 28, United States Code, Section 1746, that the following is true and correct:

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigation of and to make arrests for offenses enumerated in Section 2516 of Title 18. I have been employed with the Winston-Salem Police Department (WSPD) as a law enforcement officer since 1993. I have been assigned to the Criminal Investigations Division as a Detective with the WSPD since 2004. I am a federally sworn TFO with TOIG, currently assigned to the United States Treasury Financial Crimes Task Force in Greensboro, North Carolina. As part of my duties, I investigate crimes against the United States Treasury and its departments and entities, including but not limited to illegal scams involving social media networking sites. During my law enforcement career, I have conducted or participated in investigations of numerous fraud schemes. I have also participated in the execution of search and seizure warrants in the capacity of affiant and participant.

2. I completed the North Carolina Basic Law Enforcement Training (BLET) program in December 1993, and have completed approximately 2700 hours of advanced in-service training on a multitude of topics concerning criminal investigations and financial crimes based subject matter. I hold an Advanced Law Enforcement Certificate



issued by the State of North Carolina Justice Academy and a Bachelor's Degree in Business Administration from Wingate University.

3. This affidavit is made in support of a Verified Complaint of Forfeiture for \$10,221.81 in U.S. Currency seized from Bank of America account ending in 0050, in the name of Daniel Anasili PAPKA. The \$10,221.81 in U.S. Currency is subject to seizure and forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C), on the grounds that it constitutes property involved in, or traceable to specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), including wire fraud (18 U.S.C. § 1343).

4. I make this affidavit based upon information provided by other sworn law enforcement officers, the documentary evidence described below, and my own experience as a TFO with TOIG.

5. On January 27, 2017, the WSPD received a complaint from a victim who currently resides in Winston-Salem, North Carolina, hereafter referred to as "HSC," regarding a scam involving \$80,000.00.

6. HSC received a message via Facebook Messenger from one of HSC's Facebook "friends," M. Johnson (Johnson). What HSC did not know at the time, but would later learn, is that Johnson's Facebook account had been "hacked" and was being used by an unknown and unauthorized user.

7. The unknown individual using Johnson's Facebook account told HSC that he/she had been receiving money from a large government grant and asked if HSC was interested in receiving federal grant money. The unknown subject referred HSC to

another Facebook user known as K. Walter (Walter) to get more information about such grants.

8. HSC began to communicate with Walter via Facebook and was given instructions on different grant programs available for a fee. Walter told HSC that the more money HSC "invested," the more HSC would receive in return from the government.

9. Walter told HSC that if HSC deposited \$80,000 in cash into certain Bank of America (BOA) and Wells Fargo bank accounts, HSC would receive \$3 million in return. Walter sent HSC instructions for making the deposits, including account numbers, bank routing numbers, and amounts to deposit.

10. HSC made a total of nine deposits into the BOA and Wells Fargo accounts Walter specified, for a total of \$80,000.

11. After HSC made these deposits, Walter informed HSC, again via Facebook, that HSC needed to deposit an additional \$150,000 in cash because the U.S. Internal Revenue Service would not release the \$3 million until HSC paid a 2% tax.

12. HSC then contacted Johnson by telephone, and Johnson informed HSC that Johnson's Facebook account had been hacked, and that Johnson did not know anything about the messages sent to HSC using Johnson's Facebook account.

13. HSC then realized he/she was the victim of a scam and called the WSPD. WSPD Officer R.A. Dunn and I interviewed HSC. HSC also provided printouts of the

Facebook conversations between HSC and Walter and deposit slips for each of the nine deposits at issue. These materials corroborate HSC's description of the scam.

14. I contacted BOA Fraud Investigator P. Williams, who stated that all of the BOA accounts into which HSC had deposited funds were closed due to fraud, except for one (account ending in 0050). Mr. Williams further stated that each of the accounts had been opened by Nigerian nationals. The remaining open account had been opened by Daniel Anasili PAPKA using a Nigerian passport (A06623918) in Fredericksburg, Maryland, in November 2016. Based upon my training and experience, Nigeria is a country often associated with fraudulent activity.

15. I then contacted Special Agent K. Daugherty of the U.S. Department of State. SA Daugherty confirmed that the passport used to open the BOA account described above had been issued to PAPKA.

16. Based on my training and experience, the nine cash deposits described above are consistent with the conduct of an internet money scam, in violation of 18 U.S.C. § 1343 and 18 U.S.C. § 912.

17. On August 17, 2017, United States Magistrate Judge L. Patrick Auld issued a seizure warrant for all funds on deposit up to a total of \$10,221.81 in account number ending in 0050 at Bank of America, in the name of Daniel Anasili PAPKA.

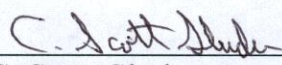
18. TOIG TFO Chrystal Overcash served the seizure warrant on BOA on August 18, 2017.

19. BOA complied with the warrant issuing a check for the \$10,221.81 on September 6, 2017.

20. The funds are currently held in the United States Secret Service Suspense Account.

21. Based on the investigation described above, and upon my training and experience, I submit there is probable cause to believe that \$10,221.81 in U.S. Currency seized from Bank of America account ending in 0050, in the name of Daniel Anasili PAPKA, is proceeds of an internet money scam which constitutes wire fraud in violation 18 U.S.C. § 1343, and is therefore subject to seizure and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

This the 6th day of February, 2018.



C. Scott Sluder
Task Force Officer
Department of the Treasury –
Office of Inspector General